

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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In re:)	Chapter 7
)	
DECURTIS HOLDINGS LLC, <i>et al.</i> , ¹)	Case No. 23-10548 (JKS)
)	
Debtors.)	(Jointly Administered)
)	
)	Hearing Date: TBD
<hr/>		Objection Deadline: October 10, 2023 at 4:00 p.m. (ET)

**SUMMARY OF COMBINED FOURTH MONTHLY AND FINAL
APPLICATION OF GROOMBRIDGE, WU, BAUGHMAN & STONE LLP FOR
COMPENSATION FOR SERVICES RENDERED AND FOR REIMBURSEMENT OF
EXPENSES AS SPECIAL COUNSEL TO THE DEBTORS
FOR THE (I) MONTHLY PERIOD AUGUST 1, 2023 THROUGH AUGUST 29, 2023
AND (II) FINAL PERIOD APRIL 30, 2023 THROUGH AUGUST 29, 2023**

Name of Applicant:	<u>Groombridge, Wu, Baughman & Stone LLP</u> <u>("GWBS")²</u>
Authorized to Provide Professional Services to:	<u>the above-captioned Debtors</u>
Date of Retention:	<u>June 9, 2023</u>
Monthly Period for which compensation and reimbursement are sought:	<u>August 1, 2023 through August 29, 2023</u>
Monthly Amount of Compensation sought as actual, reasonable, and necessary:	<u>\$64,194.40 (80% of \$80,243.00)</u>
Monthly Amount of Expense Reimbursement sought as actual, reasonable, and necessary:	<u>\$0.00</u>
Final Period for which compensation and reimbursement are sought:	<u>April 30, 2023 through August 29, 2023</u>
Amount of Final Compensation sought as actual, reasonable, and necessary:	<u>\$1,730,994.50</u>

¹ The Debtors in these chapter 7 cases, along with the last four digits of each Debtor's federal tax identification number include: DeCurtis Holdings LLC (2384) and DeCurtis LLC (9241). The location of the Debtors' service address in these chapter 7 cases is 3208 East Colonial Drive, Suite C190, Orlando, FL 32803.

² Capitalized terms used but not otherwise defined in this summary have the meanings ascribed to such terms below.

Amount of Final Expense Reimbursement
sought as actual, reasonable, and necessary:

\$128,165.13

This is a(n): X monthly ____ interim X final

Previously Filed Applications:

Date Filed	Period Covered	Requested Fees	Requested Expenses	Approved Fees (80%)	Approved Expenses (100%)
7/5/2023 ³	April 30, 2023 – May 31, 2023	\$106,135.00	\$19.22	\$84,908.00	\$19.22
8/3/2023	June 1, 2023 – June 30, 2023	\$332,061.50	\$83,791.36	\$265,649.20	\$83,791.36
8/15/2023	July 1, 2023 – July 31, 2023	\$1,212,555.00	\$44,354.55	\$970,044.00	\$44,354.55
TOTAL		\$1,650,751.50	\$128,165.13	\$1,320,601.20	\$128,165.13

³ Payment has been received for this invoice filed July 5, 2023. Groombridge, Wu, Baughman, & Stone LLP received payment on July 28, 2023, in the amount of \$84,927.22, which totals the 80% approved fees of \$84,908.00 plus 100% of the approved expenses of \$19.22.

**COMPENSATION BY PROFESSIONAL FOR THE COMPENSATION PERIOD
AUGUST 1, 2023 THROUGH AND INCLUDING AUGUST 29, 2023**

Name of Professional Person	Initials of Professional Person or Other Reference ID Used in the Application for the Professional Person	Position, Department, and Number of Years in that Position⁴	Year of Admission	Hourly Billing Rate (including changes)	Total Billed Hours	Total Compensation
Nicholas P. Groombridge	NPG	Partner, IP Litigation, 20+ years	1989	\$2,025.00	11.80	\$23,895.00
Jennifer H. Wu	JHW	Partner, IP Litigation, 9 years	2004	\$2,025.00	9.20	\$18,630.00
Partner Total					21.00	\$42,525.00
Counsel Total					0.00	\$0.00
Allison C. Penfield	ACP	Associate, IP Litigation, 5 years	2016	\$1,210.00	9.20	\$11,132.00
Ben Hsu	BH	Associate, IP Litigation, 3 months	2023	\$800.00	17.90	\$14,320.00
Chih-wei Wu	CWW	Associate, IP Litigation, 2 years	2021	\$800.00	3.40	\$2,720.00
Kyle N. Bersani	KNB	Associate, IP Litigation, 1 year	2022	\$735.00	12.60	\$9,261.00
Associate Total					43.10	\$36,713.00
Bernie Pound	BBP	Paralegal, IP Litigation, 27 years		\$475.00	0.60	\$285.00
Staff/Paraprofessional Total					0.60	\$285.00
Grand Total: \$80,243.00						
Blended Rate: \$1,153.00						

⁴ Groombridge, Wu, Baughman, & Stone LLP is not including a “customary and comparable compensation” disclosure in accordance with the US Trustee Guidelines, as we do not have bankruptcy attorneys in the firm.

FINAL COMPENSATION BY PROFESSIONAL
APRIL 30, 2023 THROUGH AUGUST 29, 2023

Name of Professional Person	Initials of Professional Person or Other Reference ID Used in the Application for the Professional Person	Position, Department, and Number of Years in that Position	Year of Admission	Hourly Billing Rate (including changes)	Total Billed Hours	Total Compensation
Nicholas P. Groombridge	NPG	Partner, IP Litigation, 20+ years	1989	\$2,025.00	161.60	\$327,240.00
Jennifer H. Wu	JHW	Partner, IP Litigation, 9 years	2004	\$2,025.00	202.40	\$409,860.00
Partner Total					364.00	\$737,100.00
Daniel J. Klein	DJK	Counsel, IP Litigation, 6 years	2011	\$1,350.00	44.60	\$60,210.00
Counsel Total					44.60	\$60,210.00
Allison C. Penfield	ACP	Associate, IP Litigation, 5 years	2016	\$1,210.00	390.40	\$472,384.00
Ben Hsu	BH	Associate, IP Litigation, 3 months	2023	\$800.00	159.10	\$127,280.00
Chih-wei Wu	CWW	Associate, IP Litigation, 2 years	2021	\$800.00	139.40	\$111,520.00
Kyle N. Bersani	KNB	Associate, IP Litigation, 1 year	2022	\$735.00	198.10	\$145,603.50
Associate Total					887.00	\$856,787.50
Bernie Pound	BBP	Paralegal, IP Litigation, 27 years		\$475.00	88.90	\$42,227.50
Sayem Osman	SOS	Paralegal, IP Litigation, 25 years		\$435.00	79.70	\$34,669.50
Staff/Paraprofessional Total					168.60	\$76,897.00
Grand Total: \$1,730,994.50						
Blended Rate: \$1,095.00						

**COMPENSATION BY PROJECT CATEGORY FOR THE COMPENSATION PERIOD
AUGUST 1, 2023 THROUGH AND INCLUDING AUGUST 29, 2023**

Project Category (Examples)	Task Code	Total Hours	Total Fees
Fact Investigation/Development	L110	0.40	294.00
Analysis/Strategy	L120	36.60	44,008.00
Court Mandated Conferences	L230	1.50	2,487.50
Other Written Motions and Submissions	L250	12.60	10,543.50
Written Motions and Submissions	L430	0.30	607.50
Other Trial Preparation and Support	L440	1.00	2,025.00
Trial and Hearing Attendance	L450	2.10	3,762.50
Post-Trial Motions and Submissions	L460	10.20	16,515.00
TOTAL		64.70	\$80,243.00

FINAL COMPENSATION BY PROJECT CATEGORY
APRIL 30, 2023 THROUGH AND INCLUDING AUGUST 29, 2023

Project Category (Examples)	Task Code	Total Hours	Total Fees
Fact Investigation/Development	L110	16.40	24,980.50
Analysis/Strategy	L120	402.40	509,077.00
Settlement/Non-Binding ADR	L160	4.00	4,840.00
Other Cases Assessment, Development and Administration	L190	3.20	4,442.50
Pleadings	L210	14.90	11,829.00
Court Mandated Conferences	L230	6.10	9,980.50
Other Written Motions and Submissions	L250	154.00	175,368.00
Written Discovery	L310	5.20	6,618.00
Depositions	L330	49.70	68,839.00
Other Discovery	L390	1.20	1,452.00
Fact Witnesses	L410	8.00	16,200.00
Expert Witnesses	L420	1.20	2,430.00
Written Motions and Submissions	L430	104.80	147,977.00
Other Trial Preparation and Support	L440	240.70	196,553.00
Trial and Hearing Attendance	L450	213.50	271,767.00
Post-Trial Motions and Submissions	L460	238.90	278,641.00
TOTAL		1,464.20	\$1,730,994.50

FINAL EXPENSE CATEGORY
APRIL 30, 2023 THROUGH AND INCLUDING AUGUST 29, 2023

Expense Category	Service Provider (if applicable)	Total Expenses
Computer Assisted Legal Research	Westlaw, Lexis, Pacer	\$5,865.07
Travel-Hotels/Meals/Transportation		\$3,759.97
Copy Services	TransPerfect	\$2,611.52
Professional Services ⁵	Schulte Roth & Zabel LLP	\$100,905.56
Deposition Transcript Services	Veritext	\$15,023.01
Total:		\$128,165.13

⁵ Groombridge, Wu, Baughman, & Stone LLP retained Schulte Roth & Zabel LLP as counsel to advise with respect to bankruptcy issues implicated as part of Groombridge's role as section 327(e) counsel to the Debtors, including, but not limited to, advice in connection with Groombridge's retention in these cases.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Chapter 7

DECURTIS HOLDINGS LLC, *et al.*,¹

Case No. 23-10548 (JKS)

Debtors.

(Jointly Administered)

Hearing Date: TBD

Objection Deadline: October 10, 2023 at 4:00 p.m. (ET)

**COMBINED FOURTH MONTHLY AND FINAL APPLICATION
OF GROOMBRIDGE, WU, BAUGHMAN & STONE LLP AS SPECIAL COUNSEL TO
THE DEBTORS FOR COMPENSATION FOR
SERVICES RENDERED AND FOR REIMBURSEMENT OF EXPENSES
FOR THE MONTHLY PERIOD AUGUST 1, 2023 THROUGH AUGUST 29, 2023
AND FINAL PERIOD APRIL 30, 2023 THROUGH AUGUST 29, 2023**

In accordance with (i) the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 174] (the “Interim Compensation Order”); (ii) sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court of the District of Delaware (the “Local Bankruptcy Rules”), Groombridge, Wu, Baughman & Stone LLP (“GWBS”), as Special Counsel to the Debtors, hereby submits this monthly fee statement (this “Monthly Fee Statement”) seeking compensation for professional services rendered in the amount of \$64,194.40 (80% of \$80,243.00) and reimbursement of actual and necessary expenses incurred in the amount of \$0.00, for a total of \$80,243.00 for the period from August 1, 2023, through and including August 29, 2023 (the “Statement Period”) and a final allowance with

¹ The Debtors in these chapter 7 cases, along with the last four digits of each Debtor's federal tax identification number include: DeCurtis Holdings LLC (2384) and DeCurtis LLC (9241). The location of the Debtors' service address in these chapter 7 cases is 3208 East Colonial Drive, Suite C190, Orlando, FL 32803.

respect to the sums of \$1,730,994.50 as compensation and \$128,165.13 for reimbursement of actual and necessary expenses, for a total of \$1,859,159.63 for the period April 30, 2023 through and including August 29, 2023 (the “Final Compensation Period”). In support of the Monthly Fee Statement, GWBS submits the declaration of Nicholas P. Groombridge, a partner at GWBS (the “Groombridge Declaration”), which is attached hereto as **Exhibit B** and incorporated herein by reference. In further support of the Monthly Fee Statement, GWBS respectfully represents as follows:

Jurisdiction

1. The United States Bankruptcy Court for the District of Delaware (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference from the United States District Court for the District of Delaware, dated February 29, 2012. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2) and GWBS confirms its consent pursuant to Local Bankruptcy Rule 9013-1(f) to the entry of a final order by the Court in connection with this Monthly Fee Statement to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

2. Venue in this Court is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory bases for the relief requested herein are Bankruptcy Code sections 330 and 331, Bankruptcy Rule 2016 and Local Bankruptcy Rules 2016-1 and 2016-2.

Background

4. On April 30, 2023 (the “Petition Date”), the Debtors filed voluntary petitions for relief pursuant to chapter 11 of the Bankruptcy Code in this Court.

5. The Debtors continued to manage and operate their business as debtors in

possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code until August 29, when this Court entered an order [Docket No. 545] pursuant to section 1112(A) and (B) of the Bankruptcy Code, converting the Debtors' Chapter 11 Cases to cases under Chapter 7.

6. On May 19, 2023, the United States Trustee for Region 3 (the "U.S. Trustee") filed a statement that the U.S. Trustee was unable to form an official committee of unsecured creditors [Docket No. 126].

GWBS's Retention

7. On May 12, 2023, the Debtors filed the *Application of Debtors to Retain and Employ Groombridge, Wu, Baughman & Stone, LLP as Special Counsel to the Debtors and Debtors in Possession Pursuant to Section 327(e) of the Bankruptcy Code, Bankruptcy Rules 2014(a) and 2016, and Local Rule 2014-1, Effective as of the Petition Date* [Docket No. 93] (the "GWBS Retention Application"), which was granted by an order of this Court dated June 9, 2023 [Docket No. 227] (the "GWBS Retention Order")

Interim Compensation Order

8. On May 26, 2023, the Court entered the Interim Compensation Order. The GWBS Retention Order authorizes the Debtors to compensate and reimburse GWBS in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Local Bankruptcy Rules and the Interim Compensation Order.

Relief Requested

9. In this Application, GWBS is requesting entry of an order, substantially in the form attached hereto as **Exhibit B**, (a) granting final allowance of (i) compensation for the actual, reasonable and necessary professional services that GWBS has rendered to the Debtors in the

amount of \$1,730,994.50 and (ii) the actual, reasonable and necessary out-of-pocket expenses incurred in representing the Debtors in the amount of \$128,165.13; and (b) authorizing the Debtors to pay GWBS any remaining allowed but unpaid fees and expenses.

10. GWBS has received no payment and no promises for payment from any source for services provided or to be provided in any capacity whatsoever in connection with the chapter 11 cases other than in accordance with the GWBS Retention Order and the Interim Compensation Order.

11. Pursuant to Bankruptcy Rule 2016(b), GWBS has neither shared nor agreed to share (i) any compensation it has received or may receive with another party or person other than with the partners, counsel and associates of GWBS or (ii) any compensation another person or party has received or may receive.²

Reservation of Rights

12. To the extent time for services rendered or charges for disbursements incurred in connection with the Statement Period were not processed prior to the preparation of this Monthly Fee Statement, or GWBS has for any other reason not sought compensation or reimbursement of expenses herein with respect to any services rendered or expenses incurred during the Statement Period, GWBS reserves the right to request additional compensation for such services and reimbursement of such expenses in a future monthly fee statement and/or interim fee application.

No Prior Request

13. No prior application has been made in this Court or in any other court for the relief requested herein for the Statement Period.

² In accordance with Local Bankruptcy Rule 2016-2(e)(iii), GWBS has not charged more than \$0.10 per page for black and white photocopies, has not charged more than \$0.80 per page for color photocopies, has not charged for incoming facsimile transmissions and has not charged more than \$0.25 per page for outgoing facsimiles. GWBS does not surcharge for computerized research.

Notice

14. Notice of this Monthly Fee Statement and Final Fee Application will be provided to the Notice Parties, as defined in the Interim Compensation Order, in accordance with such order.

Conclusion

WHEREFORE, in this application, GWBS respectfully requests, entry of an order, substantially in the form attached hereto as Exhibit B, (a) granting final allowance of (i) compensation for the actual, reasonable and necessary professional services that GWBS has rendered to the Debtors in the amount of \$1,730,994.50 and (ii) the actual, reasonable and necessary out-of-pocket expenses incurred in representing the Debtors in the amount of \$128,165.13; and (b) authorizing the Debtors to pay GWBS any remaining allowed but unpaid fees and expenses.

Dated: September 18, 2023
New York, New York

/s/ Nicholas P. Groombridge

Nicholas Groombridge

Jennifer H. Wu

Danielle Rosenthal

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Special Counsel to the Debtors and Debtors in Possession